

(Caption of Case)

Application of U-Haul Co. of South Carolina,
Incorporated for a Class E (Household Goods)
Certificate of Public Convenience and Necessity for
the Operation of a Motor Vehicle Carrier

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2009 - 141 - T

(Please type or print)

Submitted by: John J. Pringle, Jr
Address: P.O. Box 2285
Columbia, SC 29202

SC Bar Number: 11208
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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☒ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input checked="" type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input checked="" type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

ELLIS:LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com

September 16, 2009

FILED ELECTRONICALLY

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
PO Drawer 11649
Columbia SC 29211

RE: Application of U-Haul Co. of South Carolina, Incorporated for a
Class E (Household Goods) Certificate of Public Convenience and
Necessity for the Operation of a Motor Vehicle Carrier
Docket No. 2009-141-T, Our File No. 2054-11673

Dear Mr. Terreni:

On behalf of U-Haul Co. of South Carolina, Incorporated, ("U-Haul") or ("Applicant"), and pursuant to Commission Rule 103-852, I request that the Commission grant U-Haul leave to take the deposition of one or more witnesses chosen by the Applicant in the above-referenced Docket. This witness (or these witnesses) will testify as U-Haul's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing this witness (or these witnesses) to testify via deposition will accommodate his or her (or their) very busy schedules.

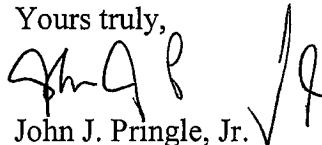
The facts that U-Haul seeks to establish by this deposition are those that support U-Haul's application in this Docket: that there is statewide demand for household goods moving services that is not current being met.

The deposition(s) will take place via telephone or otherwise, at the offices of Ellis, Lawhorne & Sims, P.A., 1501 Main Street, 5th Floor, Columbia, South Carolina 29201.

By copy of this letter, I am serving all parties of record in this proceeding and enclose my Certificate of Service to that effect.

With kind regards, I am

Yours truly,


John J. Pringle, Jr.

cc: Jeffrey M. Nelson, Esquire (via electronic mail service)
Mr. Thomas Tollison (via electronic mail service)
All parties of record (via U.S. mail service)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-141-T**

Application of U-Haul Co. of South)	
Carolina, Incorporated for a Class E)	
(Household Goods) Certificate of Public)	CERTIFICATE OF SERVICE
Convenience and Necessity for the)	
Operation of a Motor Vehicle Carrier)	

This is to certify that I have caused to be served this day, one (1) copy of the **Request for Leave to Take Deposition** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

VIA ELECTRONIC MAIL SERVICE

Jeffrey Nelson, Esquire
Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211

Mr. Tom Roth
Atlantic Transfer and Storage Company, Incorporated
7370 E. Spartan Boulevard
Charleston, SC, 29418

Mr. Albert H. Kohler
Kohler Moving and Storage, Incorporated
1159 Cainhoy Road
Wando, SC, 29492

Mr. Tim White
Reads Moving Systems of Carolina
1072 Dropoff Drive
Summerville, SC, 29483

Mr. Trey Ingram
Trega, LLC d/b/a Apartment Movers, Etc.
2908-B Maybank Highway
Johns Island, SC, 29455



Carol Roof
Paralegal

September 16, 2009
Columbia, South Carolina